

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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VIACOM INTERNATIONAL INC., )  
COMEDY PARTNERS, )  
COUNTRY MUSIC TELEVISION, INC., )  
PARAMOUNT PICTURES CORPORATION, )  
and BLACK ENTERTAINMENT TELEVISION )  
LLC, )  
Plaintiffs, )  
v. )  
YOUTUBE, INC., YOUTUBE, LLC, and )  
GOOGLE INC., )  
Defendants. )

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Civil Action No. 07-CV-2103  
Judge Stanton

ECF CASE

**NOTICE OF JOINT MOTION  
TO COMPEL**

THE FOOTBALL ASSOCIATION PREMIER )  
LEAGUE LIMITED, BOURNE CO. (together )  
with its affiliate MURBO MUSIC PUBLISHING, )  
INC.), CHERRY LANE MUSIC PUBLISHING )  
COMPANY, INC., CAL IV ENTERTAINMENT )  
LLC, ROBERT TUR d/b/a LOS ANGELES )  
NEWS SERVICE, NATIONAL MUSIC )  
PUBLISHERS ASSOCIATION, THE RODGERS )  
& HAMMERSTEIN ORGANIZATION, STAGE )  
THREE MUSIC (US), INC., EDWARD B. )  
MARKS MUSIC COMPANY, FREDDY )  
BIENSTOCK MUSIC COMPANY d/b/a )  
BIENSTOCK PUBLISHING COMPANY, )  
ALLEY MUSIC CORPORATION, X-RAY DOG )  
MUSIC, INC., FEDERATION FRANCAISE DE )  
TENNIS, THE SCOTTISH PREMIER LEAGUE )  
LIMITED, THE MUSIC FORCE MEDIA )  
GROUP LLC, THE MUSIC FORCE LLC, and )  
SINDROME RECORDS, LTD. on behalf of )  
themselves and all others similarly situated, )  
Plaintiffs, )  
v. )  
YOUTUBE, INC., YOUTUBE, LLC and )  
GOOGLE, INC., )  
Defendants. )

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Civil Action No. 07-CV-3582  
Judge Stanton

ECF CASE

**PLEASE TAKE NOTICE** that, the Plaintiffs in the matter of *The Football Association Premier League Ltd. and Bourne Co., et. al., on behalf of themselves and all other similarly situated, v. YouTube, Inc., et. al.*, Civil File No. 07-CV-3582 (LLS) and the Plaintiffs in the matter of *Viacom International Inc., et. al., v. YouTube Inc., et. al.*, Civil File No. 07-CV-2103 (LLS), by their respective undersigned attorneys, hereby jointly move this Court, before the Honorable Louis L. Stanton, United States District Judge, at the United States District Court, Southern District of New York, located at 500 Pearl Street, Courtroom 21C, New York, New York, as soon as the matter may be heard, or as otherwise agreed to by counsel and so ordered by the Court, for an Order granting their Motion to Compel Defendants' production of certain electronically stored information and documents and for such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Plaintiffs will rely upon the accompanying sealed Memorandum of Law in Support of Plaintiffs' Joint Motion to Compel, dated February 8, 2008, and the appendix annexed thereto, and upon the accompanying sealed Declaration of Susan J. Kohlmann dated February 8, 2008, and the exhibits annexed thereto, and upon all prior papers and proceedings in this action.

Dated: February 8, 2008  
New York, New York

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**CERTIFICATE OF SERVICE**

I, Susan J. Kohlmann, hereby certify that on February 8, 2008 I served the foregoing **Notice of Joint Motion to Compel** upon all counsel in this action action via e-mail.

Respectfully submitted,

**Viacom International Inc., Comedy Partners,  
Country Music Television, Inc., Paramount  
Pictures Corporation, and Black Entertainment  
Television LLC**

s/ Susan J. Kohlmann  
*Attorney for Plaintiffs.*